Decen U.S.D.J. 12/23/22

Via Electronic Filing Only

Hon. Vernon S. Broderick, U.S.D.J.

Letter Request for Adjournment

Re: Plaintiff: Luis M. Rojas

Our Clients: Bernardo Delgado Cruz, et al.

Docket No.: 22-cv-10391(VSB)

In the future, the parties will be expected to abide by Rule 1(G) of my Individual Rules and Practices in Civil Cases concerning requests for adjournments or extensions of time, which requires, among other things, that any extension request be made at least 48 hours in advance.

Dear Hon. Broderick:

My firm represents the interests of the defendants Bernardo Delgado Cruz, Maximum Quality Foods, Inc., Penske Truck Leasing Co., L.P. and Penske Truck Leasing Corp. in the above-referenced matter.

This letter is written to request an extension of time by which the parties have to provide the Court with a joint letter. Per the Order and Notice of Initial Conference, dated January 12, 2022, the parties are to provide the Court with a Joint Letter by December 23, 2022. One of requested information pertains to whether jurisdiction and venue lie properly with this Court. We are speaking to our client with regard to this issue and request an additional time to respond to the Court. We request that the time for the parties to provide a joint letter to the Court be extended to Friday, January 6, 2023. This will give the parties time to confer and adequately respond to all of the Court's requests.

We thank the Court for its consideration.

Very truly yours,

BARTLETT, LLP

Anne Marie Garcia

Anne Marie Garcia

/amg

CC:

Via Electronic Mail

Mikhail Yadgarov & Associates